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6 IN THE UNITED STATES DISTRICT COURT  
7  
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA, )  
10 Plaintiff, ) No. CR 3 06 70738 EMC  
11 v. ) CR 3 06 70743 EMC  
12 CARLOS NUNEZ PEREZ, ) [PROPOSED] STIPULATED ORDER  
13 v, ) CONTINUING ARRAIGNMENT OR  
14 CONRADO HECTOR LITA ) PRELIMINARY HEARING  
15 MORALES aka CONRADO H. )  
16 MORALES LITA, HERIBERTO G. )  
17 REYNOSA CHAVEZ aka )  
18 HERIBERTO C. REYNOSA )  
GROOM, )  
Defendants. )  
----- )

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20 The defendants in the above-entitled complaints are currently scheduled for arraignment on  
21 December 13, 2006. It is anticipated that these two complaints will be consolidated into one  
22 indictment.

23 In this proposed stipulated order the parties jointly request that the arraignment on December  
24 13, 2006 be vacated. Counsel for Mr. Nunez Perez requests that his arraignment proceed on  
25 Wednesday, December 20, 2006. Counsel for Mr. Morales and Mr. Chavez request that the

1 arraignment for these two defendants proceed on December 22, 2006.

2 Counsel for Mr. Chavez will be unavailable for arraignment on the 13th because of a family  
3 illness. Counsel for Mr. Nunez Perez requests this continuance as he and counsel for the government  
4 explore the possibility of a pre-indictment resolution. Counsel for Mr. Morales agrees with this  
5 continuance as he finalizes efforts regarding seeking his client's release on bail.

6 The government has no objection to these proposed continuances and joins in this motion.

7 Therefore, for good cause shown the arraignments on December 13, 2006 are vacated. Mr.  
8 Nunez Perez shall be added to this Court's calendar on December 20, 2006 for arraignment or  
9 preliminary hearing. The remaining two co-defendants shall be added to this Court's calendar on  
10 Friday, December 22, for arraignment or preliminary hearing. The Court finds good cause to  
11 continue the arraignments or preliminary hearings under Rule 5 of the Federal Rules of Criminal

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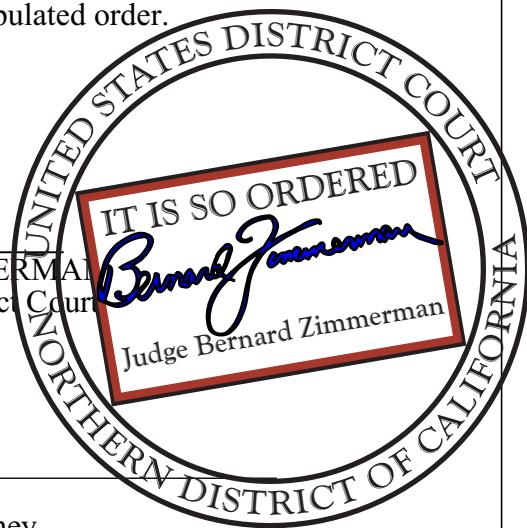
1 Procedure, based on the reasons articulated in this proposed stipulated order.  
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3 IT IS SO ORDERED.  
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5 December 11, 2006  
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7 DATED

BERNARD ZIMMERMAN  
United States District Court



8 IT IS SO STIPULATED.  
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10 DATED 12/11/06 \_\_\_\_\_  
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/s  
12 KEVIN V. RYAN  
United States Attorney  
Northern District of California  
DAVID HALL  
Assistant United States Attorney  
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14 DATED 12/11/06 \_\_\_\_\_  
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/s  
16 BARRY J. PORTMAN  
Federal Public Defender  
Northern District of California  
STEVEN G. KALAR  
Assistant Federal Public Defender  
Counsel for Nunez Perez  
17

18 DATED \_\_\_\_\_  
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/s  
20 JULIANA DROUS  
Counsel for Heriberto Chavez  
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22 DATED \_\_\_\_\_  
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/s  
24 MARK GOLDROSEN  
Counsel for Conrado Morales  
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